

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RHONDA HALL,

Plaintiff,

V.

Civil Action No. 3:05-cv-30002-MAP

VERIZON COMMUNICATIONS, INC.,
and VERIZON NEW ENGLAND, INC.

Defendants.

AFFIDAVIT OF GREG DREW

I, Greg Drew, being of full age, hereby depose and state:

1. I am an African American male.
2. I worked for Verizon for a total of thirty-three and a half years, and retired in 2003.
3. In March 2003, I was working with another African American technician in Springfield, MA. We opened a locked cross box located at 410 Carew Street, and discovered a swastika painted on the inside of the cross box door along with the statement, "Kill all Jews and Niggers !" There was also the statement, "Stanton haz (sic) a Vagina !"
4. The cross box was always kept locked and only Verizon employees possessed the tool required to open the box.
5. My co-worker, Christopher Winslow, and I immediately complained about this vile and threatening graffiti to our Verizon supervisor.

6. Mr. Winslow also took a photograph of the graffiti which was shared with Verizon management. A copy of this photograph is appended to this affidavit as Exhibit 1. The attached photograph accurately depicts the graffiti which I personally witnessed on the cross box door.

7. I and other African American technicians were exposed to this graffiti every time we opened the cross box.

8. On a daily basis, I asked my first level supervisor about plans for the removal of the graffiti.

9. On two or three occasions, I went directly to my second level manager, Sally Lynch, and complained that nothing was being done to paint over or remove the graffiti or replace the lock box door. On one of these occasions, I mentioned to Ms. Lynch that there was an available cross box door in a Verizon equipment yard which could be used to replace the door with the graffiti. I also pointed out on more than one occasion that a temporary measure would be to simply paint over the graffiti so that it was no longer visible.

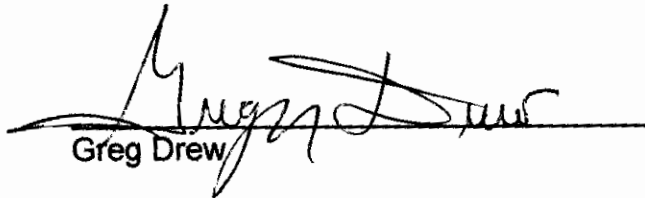
10. After more than a month went by with no action being taken to remove the graffiti, I went to see Thomas Pritchard, a Verizon District Manager in Springfield. I complained to Mr. Pritchard about the apparent unwillingness of Verizon management to respond to our numerous complaints about the graffiti. I offered to replace the cross box door myself, and Mr. Pritchard authorized me to do this.

11. Soon after my meeting with Mr. Pritchard, I replaced the cross box door myself in or around the second week in May 2003.

12. I was particularly upset about the unaccountable delay in dealing with the cross box graffiti because there had been multiple prior occasions when I had complained about other racist graffiti in other Verizon equipment boxes and facilities. Some of this other graffiti was directed at me personally, and made references to my race and ancestry in terms which were profoundly offensive and disturbing. On these prior occasions, I encountered similar resistance and delays in effectively dealing with the graffiti.

13. I further state that the facts set forth in this affidavit are made upon my own personal knowledge and belief and so far as upon belief, I believe those facts to be true.

Signed under the pains and penalties of perjury on this 24th day of October, 2006.


Greg Drew